

## State Water Resources Control Board

February 12, 2016

(Via email and Certified Mail)

**CERTIFIED MAIL**

**NO. 7015 1520 0001 8019 5982**

Mr. Collins Kalu  
Los Angeles County Metropolitan  
Transportation Authority  
One Gateway Plaza  
Los Angeles, California 9002  
[kaluc@metro.net](mailto:kaluc@metro.net)

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS  
LOCATED AT METRO DIVISION 3, 630 WEST AVENUE 28, LOS ANGELES**

Dear Mr. Kalu:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on February 3, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	<b>Failure to Maintain Operating Permit On-Site</b> – The facility permit to operate was not on-site at the time of inspection.	All	February 3, 2016	Ongoing	23 CCR 2712(i)
2	<b>Failure to Tag Monitoring Equipment</b> – The line leak detector was not tagged at the time of inspection.	T19	February 3, 2016	Ongoing	23 CCR 2641(j)
3	<b>Failure to Monitor Product Piping</b> – Sensors in the sumps are unable to detect a leak at the earliest opportunity because a collar inside the sump prevents the sensors from detecting leaks in all areas of the sump.	T17, T19 and T27	February 3, 2016	Ongoing	23 CCR 2630(d)
4	<b>Failure to Install Line Leak Detectors</b> – Pneumatic pumps have pressurized underground piping without line leak detectors.	T17	February 3, 2016	Ongoing	H&SC 25291(f); 23 CCR 2636(f)(2)

5	<b>Failure to Meet Spill Containment Requirements</b> – Spill container had sludge inside of it; this prevents its ability to hold five gallons.	T27	February 3, 2016	Ongoing	23 CCR 2635(b)(1)
6	<b>Failure to Maintain Primary and/or Secondary Containment</b> – The unleaded piping sump has liquid at bottom and a strong smell of ethanol indicating a possible leak.	T19	February 3, 2016	Ongoing	H&SC 25291(a)
7	<b>Failure to Maintain Secondary Containment</b> – The failed components listed on the December 4, 2013 secondary containment test have not been repaired or retested.	All	December 4, 2013	Ongoing	H&SC 25291(a)(2)

**You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.**

Please send all compliance documentation to the following:

**State Water Board**

Ms. Rebecca Green  
UST Enforcement Unit  
Office of Enforcement  
State Water Resources Control Board  
1001 I Street, 16<sup>th</sup> Floor  
Sacramento, California 95814  
[rebecca.green@waterboards.ca.gov](mailto:rebecca.green@waterboards.ca.gov)

**Local CUPA**

Mr. Reynaldo Husband  
Fire Inspector  
Los Angeles City Fire Department  
200 Main Street, Suite 1700  
Los Angeles, California 90012  
[reynaldo.husband@lacity.org](mailto:reynaldo.husband@lacity.org)

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at [amantha.henkel@waterboards.ca.gov](mailto:amantha.henkel@waterboards.ca.gov).

Sincerely,



Amantha Henkel  
Senior Environmental Scientist  
UST Enforcement Unit  
**Office of Enforcement**

cc: See next page.

cc: *(via email only)*

Captain Daniel Dragotto  
Los Angeles City Fire Department  
[daniel.dragotto@lacity.org](mailto:daniel.dragotto@lacity.org)

Mr. Reynaldo Husband  
Fire Inspector  
Los Angeles City Fire Department  
[reynaldo.husband@lacity.org](mailto:reynaldo.husband@lacity.org)

Mr. James Jimenez  
Environmental Compliance & Services Manager  
Los Angeles County Metropolitan  
Transportation Authority  
[jjimenezja@metro.net](mailto:jjimenezja@metro.net)

Mr. Roger Uhden  
Sr. Environmental Specialist & Quality Assurance  
Los Angeles County Metropolitan  
Transportation Authority  
[uhdenr@metro.net](mailto:uhdenr@metro.net)